

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Case No. 12-12020 (MG)
)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,)	Chapter 11
)	
Debtors.)	Jointly Administered
)	

**STIPULATION AND ORDER BETWEEN
THOMAS JAMES LACASSE AND THE DEBTORS EXTENDING THE
RESPONSE DEADLINE AND ADJOURNING THE HEARING ON DEBTORS'
OBJECTION TO PROOFS OF CLAIM FILED BY THOMAS LACASSE AGAINST
HOMECOMINGS FINANCIAL, LLC (CLAIM NO. 3852) AND RESIDENTIAL
FUNDING COMPANY, LLC (CLAIM NOS. 3856 AND 3860) PURSUANT TO
BANKRUPTCY CODE SECTION 502(b) AND BANKRUPTCY RULE 3007**

WHEREAS on August 13, 2013, the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) filed the *Debtors’ Objection to the Proofs of Claim filed by Thomas LaCasse against Homecomings Financial, LLC (Claim No. 3852) and Residential Funding Company, LLC (Claim Nos. 3856 and 3860) Pursuant to Bankruptcy Code Section 502(b) and Bankruptcy Rule 3007* [Docket No. 4635] (the “Objection”);

WHEREAS on August 14, 2013, the Debtors filed the *Amended Notice Of Debtors’ Objection To Proofs Of Claim Filed By Thomas LaCasse Against Homecomings Financial, LLC (Claim No. 3852) And Residential Funding Company, LLC (Claim Nos. 3856 And 3860) Pursuant To Bankruptcy Code Section 502(b) And Bankruptcy Rule 3007* [Docket No. 4659] (the “Amended Notice”);

WHEREAS the Amended Notice provided that a hearing on the Objection will take place on **September 24, 2013 at 10:00 a.m. (Eastern Time)** and that responses, if any, to the

Objection must be filed and be served, so as to be received no later than September 3, 2013 at 4:00 p.m. (Eastern Time);

WHEREAS on September 3, 2013, Thomas James LaCasse ("LaCasse"), by and through his undersigned counsel, filed the *Motion for Extension of Time to Respond to Objection to Claim [#4635]* [Docket No. 4923] (the "Motion for Extension"), seeking an extension of the deadline to response to the Objection;

WHEREAS, LaCasse and the Debtors (together with the Debtors, the "Parties") have agreed on an extension of the deadline to respond to the Objection and an adjournment of the hearing on the Objection;

NOW, THEREFORE, in consideration of the foregoing recitals, which are incorporated into this Stipulation, and the covenants and conditions contained therein, **IT IS STIPULATED AND AGREED** by and between the Debtors and LaCasse as follows:

1. The date by which LaCasse must file and serve his response to the Objection is extended to **September 16, 2013 at 4:00 p.m. (Eastern Time)**.

2. A hearing on the Objection will take place on **October 2, 2013 at 10:00 a.m. (Eastern Time)** before the Honorable Martin Glenn, at the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004-1408, Room 501.

3. Upon entry of this Stipulation and Order by the Court, the Motion for Extension shall be deemed resolved.

4. This Court shall retain jurisdiction to hear all matters or disputes arising from or related to this Stipulation and Order.

5. This Stipulation and Order may not be altered, modified or changed unless in writing signed by the Parties.

6. This Stipulation and Order may be executed in counterparts, each of which is deemed an original, but when taken together constitute one and the same document.

7. This Stipulation and Order will be effective immediately upon approval by the Court.

8. Each person who executes this Stipulation and Order on behalf of a Party hereto represents that he or she is duly authorized to execute this Stipulation and Order on behalf of such Party.

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RESIDENTIAL CAPITAL, LLC, *et al.*

THOMAS JAMES LACASSE

By: /s/ Norman S. Rosenbaum

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Counsel for Thomas James LaCasse

APPROVED AND SO ORDERED
This 11th day of September in New York

/s/Martin Glenn

MARTIN GLENN
United States Bankruptcy Judge